EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

AMDOCS (ISRAEL) LIMITED, an Israeli Corporation, Plaintiff, v. OPENET TELECOM, INC., a Delaware Corporation, and OPENET TELECOM LTD., an Irish Corporation, Defendants.	Case No. 1:10-CV-910 (LMB/TRJ) **JURY TRIAL DEMANDED**

DEFENDANTS' OBJECTIONS
TO PLAINTIFF'S FIRST SET OF INTERROGATORIES (NOS. 1-17)

Defendants Openet Telecom, Inc., and Openet Telecom Ltd. ("Openet") submits the following objections to Plaintiff Amdocs (Israel) Limited ("Amdocs") First Set of Interrogatories (Nos. 1-17) ("Interrogatories").

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

Openet makes the following Preliminary Statement and General Objections with respect to its response to each interrogatory.

1. Openet does not intend to provide information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. The inadvertent disclosure of any privileged information by Openet does not constitute a waiver of any applicable privilege or doctrine.

2. In responding to the Interrogatories, Openet will not undertake obligations beyond those required by the Federal Rules of Civil Procedure, the Local Rules of the Eastern District of Virginia, or any order of the Court concerning discovery. Openet does not intend to provide

information or business records that are not within its possession, custody or control. Nor does Openet intend to produce information or business records that are outside the scope of its present knowledge or information that is not maintained in the ordinary course of business by Openet.

3. By objecting Amdocs' Interrogatories and/or providing responsive information or business records, Openet does not concede the relevance, materiality or admissibility of the information requested in the Interrogatories or of any information or business records that are ultimately provided by Openet, or any information or topics addressed therein.

4. It should not be inferred from the form or substance of any objection contained herein that Openet concedes or agrees with factual characterization, assumption or legal determination contained in the particular interrogatory. By responding to these Interrogatories, Openet does not admit that Amdocs' characterizations are accurate, correct, or have a foundation. Nothing in these objections or responses is an admission that Openet agrees with Amdocs' use or interpretation of the relevant facts or terms.

5. Openet intends to provide information concerning trade secrets or other information that is proprietary to Openet subject to protective order. No information provided in response to any interrogatory shall be deemed to be a waiver of protections to which Openet's trade secrets and proprietary information are entitled.

6. Openet does not intend to provide information which is neither relevant to any material issue, claim or defense in the action, nor reasonably calculated to lead to the discovery of admissible evidence. Openet further objects to each interrogatory to the extent that topic is not reasonably limited in time.

7. It should not be inferred from the form or substance of any objection contained herein that information or business records responsive to any particular interrogatory exist.

8. Openet objects to Definition 4 to the extent it requires Openet to provide information that is not within its possession, custody or control or within its current knowledge. Openet will provide all non-privileged information located pursuant to a reasonable search.

9. Openet's responses are based upon a diligent review of information presently available to Openet. Because investigation of the facts pertaining to this action is continuing and pretrial discovery has not yet been completed, Openet reserves the right to amend or supplement its responses as appropriate.

SPECIFIC OBJECTIONS

Each of the following objections and responses to the interrogatories is made subject to the Openet's Preliminary Statement and General Objections:

INTERROGATORY NO. 1:

Identify each Accused Openet Product made, used, offered for sale, sold, or imported into the United States, and/or licensed or offered for license in the United States, during the period from December 28, 2004 to the present, by you, your distributors, or your customers, including full product number, name, trademark, software revision identification, or other designation.

RESPONSE TO INTERROGATORY NO. 1:

Openet objects to this interrogatory on the grounds that it contains multiple discrete subparts and constitutes multiple interrogatories. Openet objects to this interrogatory with respect to the terms or phrases "made," "used," "offered for sale," "sold," and "imported" as containing factual characterizations, assumptions and/or calls for legal conclusions or determinations. Openet objects to this interrogatory as overly broad in time. Openet did not receive actual notice of alleged infringement until August 16, 2010, the filing date of Amdocs' Complaint. Nor has Amdocs presented any evidence that Amdocs provided constructive notice by marking its products with the patent numbers of the Asserted Patents. Subject to Openet's Preliminary Statement and Openet's general specific objections, Openet will respond by identifying each Accused Openet Product sold after or in use as of August 16, 2010.

INTERROGATORY NO. 2:

For each Accused Openet Product, identify by name and address any Openet office or facility involved in the design, development, implementation, operation, maintenance, service, marketing, and/or sales of the Accused Openet Product, including but not limited to any office or facility located in Virginia and/or the Eastern District of Virginia, and describe in detail the nature of the work done at the facility and its relationship to the Accused Openet Products.

RESPONSE TO INTERROGATORY NO. 2:

Openet objects to this interrogatory on the grounds that it contains multiple discrete subparts and constitutes multiple interrogatories. Openet objects to this interrogatory with respect to the terms or phrases "involved," "design," "development," "implementation," "operation," "maintenance," "service," and "marketing" as used in this interrogatory as vague and ambiguous. Openet objects to this interrogatory as overly broad in time. Openet did not receive notice of alleged infringement until August 16, 2010, the filing date of Amdocs' Complaint. Subject to Openet's Preliminary Statement and Openet's general and specific objections, Openet will respond by identifying facilities where Accused Openet Products that were sold, offered for sale, or in use as of August 16, 2010 were designed and manufactured.

INTERROGATORY NO. 3:

Identify by title, including version number or similar designation every software or similar product made by or for, used, or sold, or offered for sale by Openet built on the FusionWorks framework or which has substantially the same structure or operates in substantially the same way as FusionWorks Convergent Mediation.

RESPONSE TO INTERROGATORY NO. 3:

Openet objects to this interrogatory as overly broad and unduly burdensome. Openet also objects to this interrogatory with respect to the terms or phrases "similar product," "framework," "substantially the same structure," and "operates in substantially the same way" as used in this interrogatory as vague and ambiguous. For example, it is unclear whether Amdocs is referring to previous and successive versions of FusionWorks Convergent Mediation or any piece of software that is capable of performing data mediation. Openet also objects to this interrogatory as overly broad in time. Openet did not receive notice of alleged infringement until August 16, 2010, the filing date of Amdocs' Complaint. Subject to Openet's Preliminary Statement and Openet's general and specific objections, to the extent such information exists in the ordinary course of business, and can be located without undue burden, Openet will respond by identifying products that were sold, offered for sale, or in use as of August 16, 2010 with the same functionality as FusionWorks Convergent Mediation.

INTERROGATORY NO. 4:

Identify each person who has participated in the design or development of the Accused Openet Products and, for each such person, describe with reasonable particularity the nature of his or her contribution.

RESPONSE TO INTERROGATORY NO. 4:

Openet objects to this interrogatory with respect to the terms "design," "development," and "reasonable particularity" as used in this topic as vague and ambiguous. Openet also objects to this interrogatory as overly broad in time. Openet did not receive notice of alleged infringement until August 16, 2010, the filing date of Amdocs' Complaint.

Openet further objects to this interrogatory with respect to the request to "each person" as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Openet has at least sixty current employees from low-level programmers to senior engineers, each of whom was involved in the development of the Accused Openet Products sold after or in use as of August 16, 2010 to varying degrees. Subject to Openet's Preliminary Statement and notwithstanding Openet's general and specific objections, Openet will respond by identifying persons who were primarily responsible for the design and development of the Accused Openet Products sold after or in use as of August 16, 2010.

INTERROGATORY NO. 5:

If Openet has performed any tests, or analyses of any Amdocs product, identify each such test.

RESPONSE TO INTERROGATORY NO. 5:

Openet objects to this interrogatory with respect to the term "any Amdocs product" as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Openet also objects to this interrogatory as not being limited in time. Openet objects to this interrogatory with respect to the terms "tests" and "analyses" as used in this interrogatory as vague and ambiguous. Openet's test or analyses of Amdocs products, if any, which do not relate to the subject matter claimed in the patents-in-suit are irrelevant to the claims or defenses of either party in this litigation.

Openet further objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. Specifically, Openet objects to identifying any tests, or analyses of Amdocs products performed at the direction of counsel in preparation for this litigation or any other litigation.

Subject to Openet's Preliminary Statement and notwithstanding Openet's general and specific objections, Openet will respond by identifying any tests performed on any Amdocs products demonstrated by Amdocs to be covered by the claims of the patents-in-suit..

INTERROGATORY NO. 6:

State, separately for each patent, the date, circumstances, and individuals through which Openet first became aware of the patents-in-suit.

RESPONSE TO INTERROGATORY NO. 6:

Openet objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. Openet also objects to this interrogatory as irrelevant as Openet did not have notice of alleged infringement prior to the filing of the suit. Subject to Openet's Preliminary Statement and Openet's general and specific objections, Openet will respond by identifying the circumstances through which it became aware of the patents-in-suit.

INTERROGATORY NO. 7:

State the basis, separately for each claim of each patent-in-suit, for any contention that such claim is invalid.

RESPONSE TO INTERROGATORY NO. 7:

Openet objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. Openet also objects to this interrogatory as prematurely seeking expert discovery. Openet objects to this interrogatory as premature and seeking to circumvent the Scheduling Order to be entered by the Court. Openet will provide the detailed basis for its contentions that the claims of the patents-in-suit are invalid with its invalidity contentions consistent with the Discovery Plan to be entered by the Court.

INTERROGATORY NO. 8:

If Openet contends that any prior art invalidates any claim of the patents-in-suit, state the basis, separately for each such claim of each patent, for that contention, including but not limited to a detailed description of any and all prior art upon which the contention is based, a description of where in the prior art each element of the claim is found, and, if Openet contends that the claim is invalid based on a combination of prior art references, how Openet contends a person of ordinary skill would know to combine those prior art references.

RESPONSE TO INTERROGATORY NO. 8:

Openet objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. Openet objects to this interrogatory on the grounds that it constitutes multiple interrogatories. Openet objects to this interrogatory as premature and seeking to circumvent the Scheduling Order to be entered by the Court. Openet will provide the detailed basis for its contentions that the claims of the patents-in-suit are invalid with its invalidity contentions consistent with the Discovery Plan to be entered by the Court.

INTERROGATORY NO. 9:

State the basis, separately for each claim limitation of each claim of each patent, for Openet's contention that it does not infringe the patents-in-suit. Include in your answer an identification of the particular limitations allegedly not met by each Accused Openet product.

RESPONSE TO INTERROGATORY NO. 9:

Openet objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. Openet objects to this interrogatory on the grounds that it constitutes multiple interrogatories. Openet objects to this interrogatory as premature and seeking to circumvent the Scheduling Order to be entered by the Court. Openet will provide the detailed basis for its contentions that Openet does not infringe the claims of the patents-in-suit with its non-infringement contentions consistent with the Discovery Plan to be entered by the Court.

INTERROGATORY NO. 10:

State the basis for Openet's contention in its Answer that "any injury to Plaintiff is not immediate or irreparable."

RESPONSE TO INTERROGATORY NO. 10:

Openet objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. Openet objects to this interrogatory as premature as discovery has just begun and is still ongoing. Amdocs has not stated the basis for its contention that it is entitled to injunctive relief. Amdocs has the burden of proving its contention and most of the facts relevant to the contention is in Amdocs' possession. Subject to Openet's Preliminary Statement, Openet will respond.

INTERROGATORY NO. 11:

Other than matters already set forth in response to interrogatories 1 through 11 above, if Openet contends that for any other reason it is not liable for infringement of the patents-in-suit, state the basis for that contention.

RESPONSE TO INTERROGATORY NO. 11:

Openet objects to this interrogatory as premature as discovery has just begun. Openet also objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine.

Subject to Openet's Preliminary Statement and not withstanding Openet's general and specific objections, Openet will respond.

INTERROGATORY NO. 12:

If you have conducted any patent search, prior art search, or patent investigation relating to the subject matter or claims of the patents-in-suit, state separately, identify each such search and all prior art identified therein.

RESPONSE TO INTERROGATORY NO. 12:

Openet objects to this interrogatory on the grounds that it constitutes multiple interrogatories. Openet objects to this interrogatory with respect to the terms or phrases "investigation" and "subject matter" as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory, on its face, seeks an identification of every search relating to the collection, processing, generation, or mediation of data in a network system regardless of whether they are relevant to the claims of the patents-in-suit. Openet objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. Subject to Openet's Preliminary Statement and notwithstanding Openet's general and specific objections, Openet will respond by identifying such non-privileged searches, if any, referencing the patents-in-suit.

INTERROGATORY NO. 13:

If Openet has received any opinions concerning the validity, enforceability, or infringement of either of the patents-in-suit identify each such opinion whether the opinion was directed to validity, enforceability, or infringement, for each person who was informed of the substance or conclusion of the opinion.

RESPONSE TO INTERROGATORY NO. 13:

Openet objects to this interrogatory on the grounds that it constitutes multiple interrogatories. Openet also objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. Openet objects to this interrogatory as premature, as the existence of any opinions of counsel are privileged until Openet elects to rely on such opinions. Openet objects to this interrogatory with respect to the term "substance" as used in this interrogatory as vague and ambiguous.

INTERROGATORY NO. 14:

Identify all customers from December 28, 2004 to the present who have bought or licensed Accused Openet Products (and any software groups, suites, or packages they are sold or included with) in the United States, and/or who have installed or implemented any of the Accused Openet Products in their operations in the United States or for use in their operations in the United States.

RESPONSE TO INTERROGATORY NO. 14:

Openet objects to this interrogatory with respect to the terms "installed" and "implemented" as used in this interrogatory as vague and ambiguous. Openet objects to this interrogatory as overly broad in time. Openet did not receive notice of alleged infringement until

August 16, 2010, the filing date of Amdocs' Complaint. Subject to Openet's Preliminary Statement and notwithstanding Openet's general and specific objections, Openet will respond by identifying all customers in the United States who have bought or licensed Accused Openet Products sold after or in use as of August 16, 2010.

INTERROGATORY NO. 15:

If Openet contends that lost profits would not be an appropriate measure of Amdocs's damages for Openet's infringement of any claims of the patents-in-suit, assuming that infringement is found and that the infringed claims are not found invalid and unenforceable, state the basis for that contention.

RESPONSE TO INTERROGATORY NO. 15:

Openet objects to this interrogatory as seeking information protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or doctrine. Openet objects to this interrogatory on the grounds that it seeks prematurely seeks expert discovery on the issue of damages and seeks to circumvent the Scheduling Order to be entered by the Court. Openet further objects to this interrogatory as improperly implying legal conclusions or assumptions. Subject to Openet's Preliminary Statement and notwithstanding Openet's general and specific objections, Openet responds as follows:

Openet will provide its contentions regarding damages in compliance with deadlines set by the Court's Scheduling Order.

INTERROGATORY NO. 16:

If Openet has a contention as to a reasonable royalty for Openet's infringement of any claims of the patents-in-suit, assuming that infringement is found and that the infringed claims are not found invalid and unenforceable, state with particularity that contended amount and/or calculation and state the basis for that contention.

RESPONSE TO INTERROGATORY NO. 16:

Openet objects to this interrogatory with respect to the term "particularity" as used in this interrogatory as vague and ambiguous. Openet also objects to this interrogatory on the grounds that it seeks prematurely seeks expert discovery on the issue of damages and seeks to circumvent the Scheduling Order to be entered by the Court. Openet further objects to this interrogatory as improperly implying legal conclusions or assumptions. Subject to Openet's Preliminary Statement and notwithstanding Openet's general and specific objections, Openet responds as follows:

Openet will provide its contentions regarding damages in compliance with deadlines set by the Court's Scheduling Order.

INTERROGATORY NO. 17:

Identify by name and title each current or former Openet employee who was previously employed by XACCT and/or Amdocs, and describe for each such employee his or her involvement in the design, development, sale, or marketing of the Accused Openet Products.

RESPONSE TO INTERROGATORY NO. 17:

Openet objects to this interrogatory on the grounds that it constitutes multiple interrogatories. Openet objects to this interrogatory as overly broad in time. Openet did not receive notice of alleged infringement until August 16, 2010, the filing date of Amdocs' Complaint. Subject to Openet's Preliminary Statement and notwithstanding Openet's general and specific objections, Openet will respond by providing the identities of current or former Openet employees who were previously employed by XACCT or Amdocs and their involvement in the design, development, sale, or marketing of the Accused Openet Products sold after or in use as of August 16, 2010.

December 17, 2010

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of December, 2010, I served on the following counsel for Amdocs (Israel) Ltd. via email and hand delivery to counsel's office, the foregoing Defendant's Objections and Responses to Plaintiff's First Set Interrogatories.

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